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7 **Attorneys for Debtor**

8 **UNITED STATES BANKRUPTCY COURT**  
9 **EASTERN DISTRICT OF CALIFORNIA**  
10 **SACRAMENTO DIVISION**

11 In re:

12 **Kyle Curtis Ash**

13 Debtor

Case No.: 2021-20922

Chapter: 13

DCN. No. RDW-1

HEARING:

DATE: JUNE 29, 2021

TIME: 9:00 AM

COURTROOM: 28

JUDGE: HON. FREDRICK E. CLEMENT

14 **DEBTORS' OPPOSITION TO ACM INVESTOR SERVICES, INC.'S MOTION**  
15 **FOR RELIEF FROM THE AUTOMATIC STAY**

16 Debtor opposes the Motion for Relief From Stay on the following grounds:

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- 18 1. The value of the property is at least \$500,000.00. The current balance of ACM
- 19 Investor Services, Inc. proof of claim is 288,686.18. The Debtor has atleast a
- 20 39% equity cushion.
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- WHEREFORE, the Debtor requests the Court consider the matter.

/s/ Joseph C. Rosenblit  
Joseph C. Rosenblit  
Attorney for Debtor